

EXHIBIT A



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June 5, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 7W
Trenton NJ 08608

Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation - MDL 2738*

This correspondence relates to cases attached as "Exhibit A."

Your Honor:

On Monday, June 3, 2024, the Johnson & Johnson Defendants submitted two letters [Dkt. Nos. 32599 and 32601] addressing cases on their attached Exhibits A [Dkt. Nos. 32599 and 32601-02]. In the first letter [Dkt. 32599] defense counsel states an Order to Show Cause will be filed on July 1, 2024 should any cases attached as Exhibit A continue to fail to produce a Plaintiff Profile Form ("PPF"). In the second letter [Dkt. 32601] defense counsel asks why cases included as Exhibit A should not be dismissed with prejudice for an alleged failure to serve a PPF pursuant to the process set up in the Case Management Order ("CMO"), dated February 13, 2024 [Dkt. 29032]. These letters do not reflect accurate information.

Counsel for Defendants Johnson & Johnson identified the cases identified in Plaintiffs' Exhibit A, filed by undersigned counsel, as not having complied with the Court's order. Cases attached as Exhibit A are in compliance and undersigned counsel has submitted PPFs for each case, contrary to assertions of Defendants. Plaintiffs' cases should not be dismissed, because the attached cases are in compliance with the Court's order. Plaintiffs are prejudiced by Defendants' inaccurate reports to the contrary.

Accordingly, Plaintiffs seek entry of an Order that (1) directs Johnson & Johnson to correct the Record in the docket, so as to avoid further prejudice to each Plaintiff; (2) instructs Johnson & Johnson to directly coordinate with Brown Greer for the purpose of updating and/or verifying J&J's own access to the MDL Centrality records; including complete and full content; (3) instructs J&J to meet and confer with the undersigned counsel if J&J contends the attached claims are not contained within the portal; and whatever further relief the court deems just and appropriate.

Thank you for your consideration of these matters.

Dated: June 5, 2024

Respectfully submitted,

/s/ Rhett A. McSweeney

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MDL 1201	Plaintiff Submission Status Report Talcum Powder Litigation							
Row	Plaintiff Name	Law Firm Name	Plaintiff ID	Name of First Named Plaintiff on Complaint	Original PPF Date	Amended PPF Date(s)	Most Recent PPF Date	
15.	BROWN, LOIS	McSweeney/Langevin LLC	24950	ROBERT, BROWN	2/14/24		2/14/2024	
17.	MCDONALD, BEVERLY	McSweeney/Langevin LLC	25015		4/29/24		4/29/2024	
21.	SHEVENOCK, GEORGIANNA	McSweeney/Langevin LLC	27550		4/17/24		4/17/2024	
22.	PASCUCCI, BEATRICE	McSweeney/Langevin LLC	27640		4/3/24		4/3/2024	
25.	SCIFO, MARY	McSweeney/Langevin LLC	27653		4/8/24		4/8/2024	
26.	SANDEEN, LAUREN	McSweeney/Langevin LLC	27654		3/5/24		3/5/2024	
27.	PLAYFORD, MYTYL	McSweeney/Langevin LLC	27655		2/14/24		2/14/2024	
28.	SNEED, MARIA	McSweeney/Langevin LLC	27656		2/14/24		2/14/2024	
35.	BARROW, BETTY	McSweeney/Langevin LLC	35188	BARROW, BETTY	11/28/23		11/28/2023	
39.	BRASKA, ELINOR	McSweeney/Langevin LLC	60243	FYE, DIANNA	4/4/24		4/4/2024	
40.	OWENS, SHARON	McSweeney/Langevin LLC	60351	OWENS, SHARON	2/28/24		2/28/2024	
41.	TARRIO, STEPHANIE	McSweeney/Langevin LLC	60361	TARRIO, DYTANIAL	4/19/24		4/19/2024	
43.	MCCLINTON MATTHEWS, JULIE	McSweeney/Langevin LLC	60436	MCCLINTON-MATTHEWS, JULIE	4/29/24		4/29/2024	
47.	VENTERS, LISA	McSweeney/Langevin LLC	60560	VENTERS, LISA	4/19/24		4/19/2024	
48.	BECK, BETTY	McSweeney/Langevin LLC	60631	SLENKER, THOMAS	4/25/24		4/25/2024	
51.	BERNARD, JOYCE	McSweeney/Langevin LLC	60709		4/22/24		4/22/2024	
54.	BURRELL, MELVA	McSweeney/Langevin LLC	60746		4/24/24		4/24/2024	

Cases from Docket 32599

Row #	Case Name	Case No.	Row #	Case Name	Case No.
480	Morrison, Gerald	3:20-cv-01641	1181	Sneed, Maria	3:18-cv-10303
481	Tarrio, Dytanial	3:20-cv-03057	1182	Sandeen, Lynnea	3:18-cv-10416
482	Mathews, Ronald	3:20-cv-03329	1183	Playford, Mytyl	3:18-cv-10506
483	Burrell, Melva	3:20-cv-14832	1184	Scifo, George	3:18-cv-10607
484	Slenker, Thomas	3:20-cv-15204	1185	Pascucci, Beatrice	3:18-cv-10726
485	Venters, Lisa M	3:20-cv-18645	1186	Brown, Robert	3:18-cv-11413
486	Bernard, Nathaniel	3:20-cv-19651	1188	McDonald, James	3:18-cv-13587
			1189	Shevenock, Michael	3:18-cv-13689
			1191	Fye, Dianna	3:19-cv-18735
			1192	Owens, Jack	3:19-cv-19392

Cases from Docket 32601-2